

UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF WEST VIRGINIA

U.S. DISTRICT COURT  
FILED AT WHEELING, WV  
OCT - 1 2013  
NORTHERN DISTRICT OF WV  
OFFICE OF THE CLERK

UNITED STATES OF AMERICA,

Plaintiff,

v.

RODNEY HARPER, a/k/a "BILLY"  
and WILLIAM WATERS, ak/a "BREW",  
Defendants.

Criminal No.

3:13-CR-47

Violations:

18 U.S.C. § 2  
18 U.S.C. § 1591(a)  
18 U.S.C. § 1594(c)  
18 U.S.C. § 1594(d)  
18 U.S.C. § 2423(a)  
18 U.S.C. § 2423(b)  
21 U.S.C. § 841(a)(1)  
21 U.S.C. § 841(b)(1)(C)

**INDICTMENT**

The Grand Jury charges that:

COUNT 1

(Conspiracy to Engage in Sex Trafficking)

From on or about the 30<sup>th</sup> day of May, 2013 to on or about the 13<sup>th</sup> day of September, 2013, in Berkeley County, within the Northern District of West Virginia and elsewhere, the defendants, **RODNEY HARPER, a/k/a "BILLY", and WILLIAM WATERS, a/k/a "BREW"**, combined, conspired, confederated and agreed with each other and with other persons known and unknown to the Grand Jury to knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means in and affecting interstate commerce, to-wit: from the State of Maryland to the State of West Virginia, "Jane Doe 1" and "Jane Doe 2", who had not attained the age of 18 years, knowingly and in reckless disregard of the fact that "Jane Doe 1" and "Jane

Doe 2” had not attained the age of 18 years and that “Jane Doe 1” and “Jane Doe 2” would be caused to engage in a commercial sex act.

All in violation of Title 18, United States Code, Section 1594(c).

COUNT 2

(Aiding and Abetting Sex Trafficking)

From on or about the 10<sup>th</sup> day of September, 2013 to on or about the 13<sup>th</sup> day of September, 2013, in Berkeley County, within the Northern District of West Virginia, the defendants, **RODNEY HARPER, a/k/a “BILLY”, and WILLIAM WATERS, a/k/a “BREW”**, aiding and abetting each other, knowingly recruited, enticed, harbored, transported, provided, obtained and maintained by any means in and affecting interstate commerce, to-wit: from the State of Maryland to the State of West Virginia, “Jane Doe 1” and “Jane Doe 2”, who had not attained the age of 18 years, knowing and in reckless disregard of the fact that “Jane Doe 1” and “Jane Doe 2” had not attained the age of 18 years and that “Jane Doe 1” and “Jane Doe 2” would be caused to engage in a commercial sex act.

All in violation of Title 18, United States Code, Section 1591(a) and 2.

COUNT 3

(Transportation of Minors)

From on or about the 10<sup>th</sup> day of September, 2013 to on or about the 13<sup>th</sup> day of September, 2013, in Berkeley County, within the Northern District of West Virginia, the defendant, **WILLIAM WATERS, a/k/a "BREW**, did knowingly transport an individual who had not attained the age of 18 years, that is Jane Doe 1 and Jane Doe 2, in interstate commerce from Maryland to West Virginia, with the intent that such individual engage in sexual activity for which any person can be charged with a criminal offense, to-wit: sexual assault in the third offense, in violation of West Virginia Code § 61-8B-5.

All in violation of Title 18, United States Code, Section 2423(a).

COUNT 4

(Travel in Interstate Commerce With Intent to Engage in Illicit Sexual Conduct)

From on or about September 1, 2013 to on or about September 13, 2013, defendant, **RODNEY HARPER, a/k/a "BILLY"**, traveled in interstate commerce from the State of Maryland to Berkeley County, West Virginia, within the Northern District of West Virginia, for the purpose of engaging in any sexual act (as defined in section 2246) with a person under 18 years of age that would be in violation of chapter 109A if the sexual act occurred in the special maritime and territorial jurisdiction of the United States; in violation of Title 18, United States Code, Section 2423(b).

COUNT 5

(Possession with Intent to Distribute Heroin)

On or about the 13<sup>th</sup> day of September, 2013, in Berkeley County, within the Northern District of West Virginia, the defendant, **RODNEY HARPER, a/k/a "BILLY,"** unlawfully, knowingly and intentionally possessed with intent to distribute a quantity of heroin, a Schedule I narcotic controlled substance as defined in Title 21, United States Code, Section 812(c), Schedule I(b)(10); in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

FORFEITURE ALLEGATION

*Sex Trafficking*

Pursuant to Title 18, United States Code, Section 1594(d), and Title 18, United States Code, Sections 1591 and 1594(c) the government will seek the forfeiture of property as part of the sentence imposed in this case; that is, the forfeiture of any property used, or intended to be used, to commit or to facilitate the commission of the above referenced offense, and any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such offense, including, but not limited to, \$3,361.00 in United States Currency seized on September 13, 2013.

A true bill,

/s/

Grand Jury Foreperson  
(Signature on File)

/s/ William J. Ihlenfeld, II  
William J. Ihlenfeld, II  
United States Attorney